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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Sterling Hardisty Taylor,

Plaintiff,

V.

UNITED STATES OF AMERICA and  
DOES I to X, inclusive, collectively,

### Defendants.

Case No. 2:22-cv-00435-APG-BNW

## **Stipulation and Order to Extend Time to File a Response (Second Request)**

Plaintiff and Defendants through undersigned counsel, hereby submit this stipulation to extend the date for Defendants to file and serve a responsive pleading to Plaintiff's First Amended Complaint (ECF No. 33, filed 1/31/23).

The current deadline for the United States to respond to the Plaintiff's Complaint is March 8, 2023.

The parties, through undersigned counsel, stipulate and request that the Court approve a two-weeks extension of time, from March 8, 2023, to March 22, 2023, for the United States of America to file a response to the Complaint. This is the second request for an extension of time after the Court denied the first request for failure to provide a reason for the extension under LR IA 6-1(a). ECF No. 36 The parties need the additional time as the United States is evaluating the contractual obligations with American Land & Leisure, which was the company that was maintaining the Lucerne Campgrounds in Manila, Utah, at the time of the Plaintiff's incident. The additional time is necessary to complete the

1 evaluation of such contractual obligations and to determine the necessity of filing a third-  
2 party complaint against American Land & Leisure.

3 Therefore, the parties request that the Court extend the deadline for the United States  
4 to answer or otherwise respond to **March 22, 2023**. The parties also request that the Court  
5 extend the deadline to hold their Federal Rule of Civil Procedure 26(f) conference from  
6 March 22, 2023 to **March 29, 2023**, due to this stipulation.

7 This stipulated request is filed in good faith and not for the purposes of undue delay.

8 Respectfully submitted this 8th day of March 2023.

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10 GALLIAN WELKER &  
11 ASSOCIATES, L.C

JASON M. FRIERSON  
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12 /s/ Nathan E. Lawrence  
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/s/ Virginia T. Tomova  
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19 IT IS SO ORDERED:  
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22 UNITED STATES MAGISTRATE JUDGE  
23 DATED: \_\_\_\_\_  
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March 13, 2023